

Claim Construction And Pre-Hearing Statement (Dkt. No. 50) in accordance with the Court's Amended Scheduling Order (Dkt. No. 31). In addition, the Parties have produced documents and participated in written discovery, but no depositions have been taken.

RESPECTFULLY SUBMITTED:

**Attorneys for Plaintiff
ZIPIT WIRELESS, INC.**

By: s/ Robert P. Foster

Robert P. Foster
rfoster@fosterfoster.com
FOSTER LAW FIRM, LLC
601 East McBee Avenue
Suite 104
Greenville, SC 29601
(864) 242-6200

OF COUNSEL:

(Admitted pro hac vice)
Stephen R. Risley
SMITH RISLEY TEMPEL & SANTOS LLC
Two Ravinia Drive, Suite 700
Atlanta, GA 30346
(770) 709-0022

(Admitted pro hac vice)
Matthew S. Harman
Eric S. Fredrickson
HARMAN LAW LLC
3414 Peachtree Road NE
Suite 1250
Atlanta, Georgia 30326
(404) 554-0777

Greenville, South Carolina
Dated: February 27, 2015

**Attorneys for Defendants BLACKBERRY
LIMITED and BLACKBERRY
CORPORATION**

By: s/ Steve A. Matthews

Steve A. Matthews
Federal ID No. 5119
smatthews@hsblawfirm.com
HAYNSWORTH SINKLER BOYD, P.A.
1201 Main Street (29201-3226)
P.O. Box 11889 (29211-1889)
Columbia, South Carolina
(803) 779-3080

OF COUNSEL:

(Admitted pro hac vice)
Andrew N. Thomases
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303-2284
(650) 617 4000

(Admitted pro hac vice)
Gene W. Lee
Todd M. Simpson
Matthew J. Moffa
Kyotaro Hemmi
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036-8704
(212) 596-9000